NORTH CAROLINA DIVISION OF AIR QUALITY

Application Review

Issue Date: DRAFT

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4100977
Inspector's Name: Robert Barker
Date of Last Inspection: 05/02/2019
Compliance Code: 3 / Compliance - inspection

Facility Data

Applicant (Facility's Name): City of High Point - Eastside Wastewater Treatment Plant

Facility Address:
City of High Point - Eastside Wastewater Treatment Plant
5898 Riverdale Drive
Jamestown, NC 27282

SIC: 4952 / Sewerage Systems
NAICS: 22132 / Sewage Treatment Facilities

Facility Classification: Before: Title V **After:** Title V
Fee Classification: Before: Title V **After:** Title V

Permit Applicability (this application only)

SIP: N/A
NSPS: N/A
NESHAP: N/A
PSD: N/A
PSD Avoidance: N/A
NC Toxics: N/A
112(r): N/A
Other: N/A

Contact Data

Facility Contact	Authorized Contact	Technical Contact
John Thomas Residuals Mgmt. Superintendent (336) 822-4740 PO Box 230 High Point, NC 27261	Terry Houk Director of Public Services (336) 883-3215 PO Box 230 High Point, NC 27261	John Thomas Residuals Mgmt. Superintendent (336) 822-4740 PO Box 230 High Point, NC 27261

Application Data

Application Number: 4100977.19B
Date Received: 09/09/2019
Application Type: Modification
Application Schedule: TV-Sign-501(b)(2) Part II

Existing Permit Data
Existing Permit Number: 08074/T12
Existing Permit Issue Date: 02/23/2018
Existing Permit Expiration Date: 11/30/2021

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2018	0.1600	4.10	0.1300	1.06	0.1200	0.0020	0.0009 [Benzene]
2017	0.0200	6.55	0.1800	1.63	0.1900	0.0030	0.0015 [Benzene]
2016	---	3.47	0.1000	0.9200	0.1100	0.0017	0.0008 [Benzene]
2015	0.4400	6.09	0.1700	2.11	0.2000	0.4932	0.3040 [Dichlorobenzene(p), 1,4-]

Review Engineer: Connie Horne

Review Engineer's Signature: **Date:** DRAFT

Comments / Recommendations:
Issue 08074/T13
Permit Issue Date: DRAFT
Permit Expiration Date: November 30, 2021

1. Purpose of Application

This permit action is for Part II of a two-step process allowed under 15A NCAC 02Q .0501(b)(2). The Rule states:

(c) With the exception in Paragraph (d) of this Rule, the owner or operator of an existing facility, new facility, or modification of an existing facility (except for minor modifications under Rule .0515 of this Section), including significant modifications that would not contravene or conflict with a condition in the existing permit, subject to the requirements of this Section shall not begin construction without first obtaining:

(1) a construction and operation permit following the procedures under this Section (except for Rule .0504), or
(2) a construction and operation permit following the procedures under Rule .0504 and filing a complete application within 12 months after commencing operation to modify the construction and operation permit to meet the requirements of this Section.

The Permittee obtained a construction and operation permit on February 23, 2018. According to the application, Eastside WWTP commenced operation of the sorbent polymer catalyst composite material adsorber (CD-04) in December 2018. This Part II application was submitted on September 9, 2019 within the 12-month period after commencing operation. The technical review for the Part I application is attached to this document.

2. Facility Description

The facility is a wastewater treatment plant (publicly owned treatment works) with a design capacity of 26 million gallons per day. The unit operations include screening, grit removal, primary clarification, activated sludge process, secondary clarification, biological nutrient removal operations (nitrogen and phosphorous removal), effluent filtration, ultraviolet disinfection, post aeration and solids handling (dewatering and incineration), and odor control.

3. Application Chronology

September 9, 2019	Part II application received
May 7, 2020	Draft to applicant and regional office
May XX, 2020	Draft to public notice and EPA
June XX, 2020	Public comment period ends
July XX, 2020	EPA Comment period ends
July XX, 2020	Permit issued

4. Permit Modifications/Changes

The table below outlines the proposed changes to the current permit:

Old Page No. [Air Permit No. 08074T12]	**New Page No.** [Air Permit No. 08074T13]	**Section No.**	**Changes**
All	All	---	Modified to reflect current permit number, issue and effective dates.
3	3	Section 1	Removed footnote and associated emission source tag.
12	12	2.1 A. 7	Removed "15A NCAC 02Q .0504: OPTION FOR OBTAINING CONSTRUCTION AND OPERATION PERMIT". The requirement to submit an application under this condition was satisfied with receipt of Permit Application No. 4100977.19B.
20-28	20-28	Section 3	Updated Section 3 – General Conditions to Version 5.3 (8/21/18).

5. Other Regulatory Requirements

- An application fee of $970 is required and was received by DAQ on 9/9/19.
- The appropriate number of application copies was received on 9/9/19.
- The application was signed by Terry Houk, Public Services Manager on 8/19/19.
- Guilford County has triggered increment tracking under PSD for PM-10 and SO_2. However, this permit modification does not consume or expand increments for any pollutants.
- Public notice and EPA review is required for the completion of this two-step significant process. A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also, pursuant to 15A NCAC 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 15A NCAC 02Q .0521, above. Virginia is an affected State, and Forsyth County is an affected local program within 50 miles of the facility.
- The associated dates are listed in the Application Chronology section above.

6. Facility Compliance Status

This facility was last inspected on May 2, 2019 by Robert Barker of the Winston-Salem Regional Office. According to Mr. Barker's report, this facility "appeared to be in compliance with the Air Quality standards and regulations at the time of this inspection."

7. Conclusions, Comments and Recommendations

The issuance of Air Quality Permit No. 08074T13 to City of High Point - Eastside Wastewater Treatment Plant is recommended.

NORTH CAROLINA
DIVISION OF AIR QUALITY

Application Review

Issue Date: February 23, 2018

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4100977
Inspector's Name: Robert Barker
Date of Last Inspection: 06/21/2017
Compliance Code: 3 / Compliance - inspection

Facility Data

Applicant (Facility's Name): City of High Point - Eastside Wastewater Treatment Plant

Facility Address:
City of High Point - Eastside Wastewater Treatment Plant
5898 Riverdale Drive
Jamestown, NC 27282

SIC: 4952 / Sewerage Systems
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Application Data

Application Number: 4100977.18A
Date Received: 01/22/2018
Application Type: Modification
Application Schedule: TV-Sign-501(c)(2) Part I

Existing Permit Data
Existing Permit Number: 08074/T11
Existing Permit Issue Date: 02/14/2017
Existing Permit Expiration Date: 11/30/2021

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2016	---	3.47	0.1000	0.9200	0.1100	0.0017	0.0008 [Benzene]
2015	0.4400	6.09	0.1700	2.11	0.2000	0.4932	0.3040 [Dichlorobenzene(p), 1,4-]
2013	1.13	12.63	1.63	7.27	0.6600	1.21	0.6695 [Dichlorobenzene(p), 1,4-]

Review Engineer: Rahul Thaker

Review Engineer's Signature: **Date:** February 23, 2018

Comments / Recommendations:
Issue 08074/T12
Permit Issue Date: 02/23/2018
Permit Expiration Date: 11/30/2021

1. Purpose of Application

City of High Point - Eastside Wastewater Treatment Plant (Eastside WWTP), Jamestown, Guilford County, North Carolina, has submitted a permit application to modify the current Title V permit, for constructing and operating a new adsorption unit for mercury emissions removal from the existing sewage sludge incinerator (SSI).

The DAQ has deemed the application "complete" for processing as of January 29, 2018.

Additionally, the DAQ has deemed the application a "significant permit modification" to the current Title V permit, pursuant to 15A NCAC 02Q .0516. The applicant has chosen a "two-step" process, allowed in 02Q .0501(c)(2) for this significant modification. Thus, a permit can be issued pursuant to "construction and operation permits" program in 02Q .0300, within 90 days from the receipt of the complete application. Then, within one year of commencement of operation of the proposed adsorption unit, the Permittee will be required to submit another application to comply with the Title V requirements in 02Q .0500; thus, completing the two-step process.

2. Facility Description

The facility is a wastewater treatment plant (publicly owned treatment works) with a design capacity of 26 million gallons per day. The unit operations include screening, grit removal, primary clarification, activated sludge process, secondary clarification, biological nutrient removal operations (nitrogen and phosphorous removal), effluent filtration, ultraviolet disinfection, post aeration and solids handling (dewatering and incineration), and odor control.

3. Application Chronology

1/22/18	DAQ received the application.
1/22/18	Application was not accepted due to lack of required amount of application fees.
1/29/18	Application was accepted for processing (received the required amount of application fees).
2/7/18	Discussed the application with the applicant consultant.
2/7/18 - 2/15/18	DAQ requested and received technical information about the adsorption unit.

4. Statement of Compliance

Robert Barker of Winston-Salem Regional Office inspected the facility on June 21, 2017. He concluded, "based on review of the records and visual observations, the facility appeared to be deficient in fulfilling the requirements of …02D .0515" and recommended "issu[ing] a Notice of Deficiency (NOD)."

Separately, the Permittee has certified through completion of an E5 Form that the facility is in compliance with all applicable requirements.

5. Permit Modification/Changes

This application is a request to obtain approval for installation of a new adsorption unit (ID No. CD-04) for mercury emissions control for the permitted SSI (ID No. ES-01). The new control device is to replace the existing carbon adsorber (ID No. CD-03), which had malfunctioned and been taken out of service since March 2017. Thus, the existing SSI is not in operation due to unavailability of a mercury control equipment.

A replacement adsorber is needed to comply with various mercury emissions standards in Title 40 Protection of Environment: Part 61 Subpart E, Part 62 Subpart LLL, and Part 503 Subpart E. It needs to be noted that there are no physical changes requested to the SSI itself and only the operational changes to the SSI is how the mercury emissions are to be controlled in future (i.e., current activated adsorber unit vs. proposed adsorber unit).

All applicable requirements have been included in the current permit for the existing SSI. It needs to be noted that the NC DEQ on behalf of DAQ is in the process of getting a Memorandum of Understanding (MOU) executed between

the DEQ and EPA Region 4 office, for implementing 40 CFR 62 Subpart LLL "Federal Plan Requirements for Sewage Sludge Incineration Units Constructed On or Before October 14, 2010" for existing sewage sludge incinerators in NC. When this MOU is signed and becomes effective, the above federal plan becomes both federal and state enforceable (currently it is federally enforceable only). It should also be noted that on a separate track through a revised regulation in 02D .1204 "Sewage Sludge and Sludge Incinerators", the DAQ is in process of having its state plan promulgated, conforming to 40 CFR 60 Subpart MMMM "Emission Guidelines and Compliance Times for Existing Sewage Sludge Incinerators". When this state plan is approved by the EPA, it will replace the federal plan. Until that time, the SSI at this facility will continue to comply with the federal plan.

The applicable mercury emission standards are as follows:

Part 61 Subpart E
Part 503 Subpart E

Per §61.52(b) and §503.43(b), mercury emissions from SSI shall not exceed 7.1 lb (3.2 kg) per 24-hour period.

Part 62 Subpart LLL

Per §62.15955 and Table 2 to the Subpart, mercury emissions from existing fluidized bed SSI shall not exceed 0.037 milligrams per dry standard cubic meter (3-run stack test average).

The proposed adsorber unit is a Gore [1] proprietary fixed sorbent system that relies on an innovative, fluoropolymer-based material: sorbent polymer catalyst (SPC) composite material. The sorbent in the SPC material efficiently captures both elemental and oxidized mercury, where it is securely bound within the SPC via chemisorption. The added benefit of this system is the removal of sulfur dioxide from incinerator flue gases by converting it to liquid sulfuric acid, although the applicant is not claiming any reduction efficiency for SO_2 with the new adsorption unit. SO_2 is catalytically converted to liquid sulfuric acid which is expelled out of the hydrophobic SPC material as large liquid droplets.

The proposed system is based on discrete stackable Gore mercury control modules that are installed downstream of a particulate emission control device (such as the existing wet scrubber). The system is composed of three compartments (or levels). The first compartment will have one level of five modules. The second and third compartments each will have two stacked levels of five modules (total ten for each compartment). Thus, the entire adsorption vessel will have a total of 25 modules in three levels. Each module is affixed with SPC material (fabric material) which contains a proprietary sorbent. Gore recommends sampling each compartment once every three years to determine the mercury content of that level. When the mercury content exceeds a threshold, currently equivalent to 1.5 lb/module, the modules of that compartment are replaced.

The following are salient design features of the system:

Vessel size: 7 feet (l) x 6.083 feet (w) x 31.083 feet (h)
Nos. of compartments (or levels): 3
Module size: Approximately 2 feet (l) x 2 feet (w) x 1 feet (h)
Flue gases flow rate: 6,849 acfm to 11,956 acfm
Maximum flue gases flow rate (dry basis): 6,684 dscfm
Inlet flue gases temperature: 60 to 160 ^oF
Pressure Drop: 0.35 to 3.0 inches of H_2O
Outlet flue gas temperature: 60 to 160 ^oF
Breakthrough capacity: 0.02 lb Hg/lb adsorbent
Cycle time: 3 to 15 years
Inlet mercury emission rate: 0.080 mg/dscm (0.00214 lb/hr)
Mercury control efficiency: 54 percent

[1] W. L. Gore & Associates, Inc., Elkton, MD.

Outlet mercury emission rate: 0.0368 mg/dscm (0.00098 lb/hr)
One-pass nonregenerative adsorption method

As shown above, at the maximum inlet mercury loading of 0.080 mg/dscm, the Permittee will be able to demonstrate compliance with the mercury emission standard of 0.037 mg/dscm in Part 62 Subpart LLL. The frequent annual tests as required in the above referenced federal plan will help determine whether the Permittee is able to meet the above limit on an on-going basis. It is this engineer's judgment that if the proposed adsorption unit is installed, operated, and maintained, as per the manufacturer's design and recommendations; the Permittee can achieve the necessary reductions to comply with the each of the mercury limits discussed above.

Finally, the revised permit will include the requirements to continuously measure and record pressure drop across the adsorber vessel, and annual inspection of the vessel, to assure compliance with the mercury emission standards. The permit will also specify that the pressure drop values need to be reestablished during the annual performance tests, required pursuant to Part 62 Subpart LLL.

6. NSPS, NESHAPS, PSD, Attainment Status, 112(r), CAM

NSPS

Not Applicable to the proposed change.

NESHAP

Not Applicable to the proposed change.

PSD

The County of Guilford is in attainment or unclassifiable for all promulgated National Ambient Air Quality Standards (NAAQS) in accordance with §81.334. PSD program applies to any major stationary source and any major modification to an existing major stationary source in this County.

The Eastside WWTP is a “minor” source for PSD as per the current permit. This application does not change this status. The operational change associated with the existing sewage sludge incinerator (i.e., replacing the existing carbon adsorber unit with the proposed adsorption unit) is not expected to result in a change in emissions for any regulated NSR pollutants, exceeding the applicable major source threshold of 250 tons/yr. Using the actual-to-potential applicability test (worst case test), it is not possible for the emissions changes for any regulated NSR pollutant to exceed the major source threshold. In fact, no change in emissions are expected for any regulated NSR pollutant due to the proposed modification[2]. Thus, the above mentioned physical change is deemed "minor". Therefore, no further review is required under PSD.

112(r)

Not Applicable. The Permittee does not store on-site any regulated compound in quantities exceeding the threshold levels, as per Form A3, included in the initial Title V application.

CAM

Compliance Assurance Monitoring (CAM) regulation applicability needs to be addressed for any application processed pursuant to Part 70 of 40 CFR. That is, when any renewal or a significant modification to an existing Title V permit is processed.

As stated above, this application is processed pursuant to 02Q .0300 “construction and operation permits”. Thus, the CAM requirement is not applicable at this time. When the applicant submits the second application pursuant to the

[2] As discussed earlier, SO_2 emissions can decrease, but, the applicant is not claiming any reductions.

two-step process, employed for this significant modification, the CAM applicability needs to be evaluated for the new adsorption unit.

7. Facility-wide Air Toxics

Not applicable to the proposed change.

The facility equipment (sewage sludge incinerator and three dual use generators) are exempt sources from state air toxics permitting requirement, pursuant to 02Q .0702(a)(27). The application review supporting the air quality permit 08074R09 (March 31, 2015) includes a detailed discussion on this subject matter including a determination on whether any unacceptable risk to human health exists (when air emissions of exempt sources are included in compliance demonstration). The pertinent information on discussion on unacceptable risk to human health from the above referenced application review for 08074R09 permit has been copied below for reference:

> Consistent with 2Q .0702(a)(27)(A) and (B), air toxics emissions from sources subject to Part 61 and 63 NESHAPs are exempt from the state air toxic program requirements (both 2Q .0711 and 2D .1100). Thus, the existing requirements for both 2D .1100 and 2Q .0711 will be excluded in the revised permit for all of the above pollutants and sources, as discussed above.
>
> "Moreover, due to the changes in emission control devices (i.e., changes in stack parameters) for existing sewage sludge incinerator, as discussed above, the Permittee has submitted a revised modeling demonstration for pollutants exceeding the applicable TPERs. Specifically, for emissions of arsenic, non-specific chromium (vi) compounds, di(2-ethyhexyl)phthalate, sulfuric acid, and mercury vapor, the Permittee has demonstrated compliance with 2D .1104. As per the memorandum prepared by AQAB, dated 3/11/2015, the highest predicted impact from the incinerator only emissions is for mercury vapor (0.353 lb/day, 24-hour averaging basis), at approximately 22 percent of the associated AAL. With additional emissions of mercury vapor (0.0015 lb/day) from the other sources (three 2,000 kW generators), no significant change to the above predicted impact is expected.
>
> In summary, because this incinerator is subject to Part 61 NESHAP, it is exempt from air toxics permitting in accordance with 2Q .0702(a)(27)(A). Hence, the emissions rates included in the revised modeling analysis can also not be included in the permit. Additionally, neither the removal of existing emissions limits nor the exclusion of emissions limits in the revised permit based on revised modeling demonstration is expected to present an unacceptable risk to human health due to low impacts, as discussed above.

8. Facility-wide Emissions

The following is a facility-wide emissions summary. The actual emissions are for calendar year 2016, as reported by Eastside WWTP to DAQ via submittal of emission inventories. The potential emissions (with control) are copied from the application.

Pollutant	Actual Emissions tons/yr	Potential Emissions (with control) tons/yr
PM	0.11	7.09
PM-10	0.11	6.29
PM-2.5	0.11	6.28
SO_2	Not Reported	0.69
NOx	3.47	< 250
CO	0.92	53.6
VOC	0.1	5.95

Pollutant	Actual Emissions tons/yr	Potential Emissions (with control) tons/yr
Lead	0.0195	0.0000525
GHG as CO_2e	178.72	38335
Single HAP	Negligible	3.15 (1,4 dichlorobenzene)
Aggregate HAP	Negligible	4.22

9. Stipulation Review

The following changes were made to the City of High Point Eastside Wastewater Treatment Plant's Air Quality Permit No. 08074T11:

Old Page No. [Air Permit No. 08074T11]	**New Page No.** [Air Permit No. 08074T12]	**Condition No.**	**Changes**
3	3	Section 1 Table	Removed activated carbon adsorber (ID CD-03) and replaced it with the proposed sorbent polymer catalyst composite material adsorption unit (ID No. CD-04). Included a footnote for CD-04.
3	3	Section 2.1 A. 1. Table	Removed applicable requirement under 02D .0521 (because the SSI is subject to 02D .0524 [NSPS]. Removed visible emissions as a regulated pollutant under NSPS Subpart O. Visible emissions are regulated at a level of 20 percent opacity, as a part of particulate matter standard which is a regulated pollutant under NSPS and not as a separate regulated pollutant. Removed visible emissions standard from 02D .1204 as it is not applicable to the existing SSI (because, it is subject to visible emission limit under NSPS). Removed odorous emissions requirement in 02D .1806 as referenced under 02D .1204, because municipal wastewater treatment plants are exempt under 02D .1806. Removed air toxics permitting requirement under 02D .1204 as the existing SSI is exempt from state air toxics permitting per 02Q .0702(a)(27). Included applicability of 02Q .0504 – requirement to submit another application within one year from commencement of operation of a new control device, CD-04.

4	-	Section 2.1 A.2.	Removed this non-applicable requirement.
5	4	Section 2.1 A.3.	Renumbered it to Section 2.1 A.2.
5	4	Section 2. 1 A.~~3~~ 2. b.	Revised the regulated pollutant under NSPS from TSP to PM. Removed visible emissions as a regulated pollutant under NSPS. Visible emissions are regulated at a level of 20 percent opacity as a particulate matter standard and not as a separate regulated pollutant under NSPS.
5	5	Section 2.1 A. ~~3~~ 2. d.	Revised the wordings "Carbon Adsorption", and replace them with "Sorbent Polymer Catalyst Composite Material Adsorber". Included a requirement to reestablish pressure drop values across the new adsorption unit during annual performance tests, required per Part 62 Subpart LLL.
6	6	Section 2.1 A.5.	Renumbered it to Section 2.1 A.4.
6	6	Section 2.1 A.~~5~~ 4. a.	Removed non-applicability of standards for visible emissions, odorous emissions, and toxic air pollutants.
8	7	Section 2.1 A. 6.	Renumbered it to Section 2.1 A.5.
9	9	Section 2.1 A.7.	Renumbered it to Section 2.1 A.6.
-	12	Section 2.1 A.7.	Included this new requirement.
20-28	20-28	Section 3	Included the latest set of General Conditions.

10. Conclusions, Comments, and Recommendations

- The application includes a new control device (adsorption unit). Therefore, the requirement in 15A NCAC 02Q. 0112 "Applications Requiring Professional Engineer Seal", does apply. The facility consultant (Keith McCullock, PE No. 027343) has provided a PE seal for this control device. As per NC Board of Examiners for Engineers and Surveyors, the PE license of Mr. McCullock is "current".

- The City of High Point (Justin S. Westbrook, Senior Planner) has provided a zoning consistency determination, which is dated December 12, 2017. It states, "I have received a copy of the air permit application (draft or final) and the proposed operation IS consistent with applicable zoning ordinances".

- The draft permit was sent to the Winston-Salem Regional Office (WSRO) on February 16, 2018 for review. Robert Barker from WSRO emailed on February 23rd with one editorial comment on existing SSI descriptor in Section 1 Table, the same comment made by the Permittee (Refer to Comment 1 from company and its response below).

- The draft permit was sent to Eastside WWTP on February 16, 2018 for review. The applicant (Terry Houk, Eastside WWTP) emailed on February 23rd with two editorial comments as below:

  Comment 1:

  Section 1 Table
  Correct the spelling of "of" in the descriptor of the existing SSI in Section 1 Table. That is, "od" to "of".

  DAQ Response:

  Agreed. This spelling error will be corrected.

Comment 2:

Section 2.1 6. e. Table
Remove emissions standards for multiple hearth incinerators which are not applicable to the existing SSI (because it is a fluidized bed SSI).

DAQ Response:

Agreed. The current permit includes emissions standards for both fluidized bed and multiple hearth SSI, pursuant to Part 62 Subpart LLL. Emissions standards for fluidized bed incinerators are applicable to the existing SSI at the Eastside WWTP; thus, the non-applicable emissions standards (for multiple hearth incinerators) will be removed from the air permit.

- This engineer recommends issuing the renewed permit.